



Louisville Metro Air Pollution Control District
701 West Ormsby Avenue, Suite 303
Louisville, Kentucky 40203-3137



Federally Enforceable District Origin Operating Permit (FEDOOP)

Permit No.: O-0221-19-F

Plant ID: 0221

Effective Date: 01/27/2020

Expiration Date: 01/31/2025

Permission is hereby given by the Louisville Metro Air Pollution Control District to operate the process(es) and equipment described herein which are located at:

Source: Brenntag Mid-South, Inc.
3900 Tucker Ave.
Louisville, KY 40216

Owner: Brenntag Mid-South, Inc.
1405 Hwy. 136 West
Henderson, KY 42420

The applicable procedures of District Regulation 2.17 regarding review by the U.S. EPA and public participation have been followed in the issuance of this permit. Based on review of the application on file with the District, permission is given to operate under the conditions stipulated herein. If a renewal permit is not issued prior to the expiration date, the owner or operator may continue to operate in accordance with the terms and conditions of this permit beyond the expiration date, provided that a complete renewal application is submitted to the District no earlier than twelve months and no later than ninety days prior to the expiration date.

Emission limitations to qualify for non-major status:

Pollutant:	VOC	Single HAP	Total HAP
Tons/year:	< 25	< 5	< 12.5

Application No.: 114160
Public Notice Date: 12/21/2019

Permit writer: Ulalo Chirwa



Air Pollution Control Officer
1/27/2020

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Permit Revisions and Changes

Permit No.	Public Notice Date	Issue Date	Change Type	Description/Scope
NA	05/27/2001	11/05/2001	Initial	Initial Permit Issuance
125-01-F(R1)	05/07/2007	06/30/2007	Renewal	Permit Renewal
125-01-F(R2)	10/11/2014	11/12/2014	Renewal	Permit Renewal
O-0221-19-F	12/21/2019	01/27/2020	Renewal	Permit Renewal; Source has indicated the removal of solvent storage tanks, solvent packaging, and bulk tanker loading that was previously permitted in 125-01-F(R2). Source will distribute chemicals packaged outside of Jefferson County, handle liquid bleach (sodium hypochlorite) and will lease a railroad spur that may be used to load VOC or HAP materials into truck or trailers.

Application and Related Documents

Document Handle	Date	Description
114160	8/30/2019	FEDOOP Renewal Application
124328	9/3/2019	Administratively complete letter

Abbreviations and Acronyms

AP-42	- AP-42, <i>Compilation of Air Pollutant Emission Factors</i> , published by U.S.EPA
APCD	- Louisville Metro Air Pollution Control District
BAC	- Benchmark Ambient Concentration
BACT	- Best Available Control Technology
Btu	- British thermal unit
CEMS	- Continuous Emission Monitoring System
CFR	- Code of Federal Regulations
CO	- Carbon monoxide
District	- Louisville Metro Air Pollution Control District
EA	- Environmental Acceptability
gal	- U.S. fluid gallons
GHG	- Greenhouse Gas
HAP	- Hazardous Air Pollutant
Hg	- Mercury
hr	- Hour
in.	- Inches
lbs	- Pounds
l	- Liter
LMAPCD	- Louisville Metro Air Pollution Control District
mmHg	- Millimeters of mercury column height
MM	- Million
(M)SDS	- (Material) Safety Data Sheet
NAICS	- North American Industry Classification System
NO _x	- Nitrogen oxides
PM	- Particulate Matter
PM ₁₀	- Particulate Matter less than 10 microns
PM _{2.5}	- Particulate Matter less than 2.5 microns
ppm	- parts per million
PSD	- Prevention of Significant Deterioration
psia	- Pounds per square inch absolute
QA	- Quality Assurance
RACT	- Reasonably Available Control Technology
SIC	- Standard Industrial Classification
SIP	- State Implementation Plan
SO ₂	- Sulfur dioxide
STAR	- Strategic Toxic Air Reduction
TAC	- Toxic Air Contaminant
UTM	- Universal Transverse Mercator
VOC	- Volatile Organic Compound
w.c.	- Water column
year	- Any period of twelve consecutive months, unless "calendar year" is specified
yr	- Year, or any 12 consecutive-month period, as determined by context

Preamble

This permit covers only the provisions of Kentucky Revised Statutes Chapter 77 Air Pollution Control, the regulations of the Louisville Metro Air Pollution Control District (District) and, where appropriate, certain federal regulations. The issuance of this permit does not exempt any owner or operator to whom it has been issued from prosecution on account of the emission or issuance of any air contaminant caused or permitted by such owner or operator in violation of any of the provisions of KRS 77 or District regulations. Any permit shall be considered invalid if timely payment of annual fees is not made. The permit contains general permit conditions and specific permit conditions. General conditions are applicable unless a more stringent requirement is specified elsewhere in the permit.

General Conditions

- G1. The owner or operator shall comply with all General Conditions herein and all terms and conditions in the referenced process/process equipment list.
- G2. All terms and conditions in this FEDOOP are enforceable by EPA, except those terms and conditions specified as District-only enforceable, and those which are not required pursuant to the Clean Air Act Amendments of 1990 (CAAA) or any of the Act's applicable requirements.
- G3. All application forms, reports, compliance certifications, and other relevant information submitted to the District shall be certified by a responsible official. If a change in the responsible official (RO) occurs during the term of this permit, or if an RO is added, the owner or operator shall provide written notification (Form AP-100A) to the District within 30 calendar days of such change or addition.
- G4. The owner or operator shall submit an annual compliance certification, signed by the responsible official, to the District, on or before April 15 of the year following the year for which the certification applies. This certification shall include completion of District Form 9440-O.
- G5. Periodic testing, instrumental monitoring, or non-instrumental monitoring, which may include record keeping, shall be performed to the extent necessary to yield reliable data for purposes of demonstrating continuing compliance with the terms and conditions of this permit.
- G6. The owner or operator shall retain all records required by the District or any applicable requirement, including all required monitoring data and supporting information, for a period of five years from the date of the monitoring, sampling, measurement, report, or application, unless a longer time period for record retention is required by the District or an applicable requirement. Records shall be retrievable within a reasonable time and made available to the District, Kentucky Division for Air Quality, or the EPA upon request.

- G7. The owner or operator shall provide written notification to the District, and receive approval, prior to making any changes to existing equipment or processes that would result in emissions of any regulated pollutant in excess of the allowable emissions specified in this permit.
- G8. This permit may be reissued, revised, reopened, or revoked pursuant to District Regulation 2.17. Repeated violations of permit conditions are sufficient cause for revocation of this permit. The filing of a request by the owner or operator for any reissuance, revision, revocation, termination, or a notification of planned changes in equipment or processes, or anticipated noncompliance shall not alter any permit requirement.
- G9. Except as otherwise specified or limited herein, the owner or operator shall not allow or cause the emissions to equal or exceed either 10 tons per year, or such lesser quantity as the EPA has established by rule, of any one Hazardous Air Pollutant (HAP) or 25 tons per year of all HAPs combined. Fugitive HAP emissions shall be included in this limit. HAPs are listed in section 112(b) of the CAAA and as amended in 40 CFR 63, Subpart C.
- G10. Except as otherwise specified or limited herein, the owner or operator shall not allow or cause the emissions to equal or exceed 100 tons per year of any regulated pollutant, including particulate matter, PM₁₀, PM_{2.5}, sulfur dioxide, carbon monoxide, nitrogen oxides, lead, hydrogen sulfide, gaseous fluorides, total fluorides, or Volatile Organic Compounds (VOC); any pollutant subject to any standard in District Regulation 7.02; or any substance listed in sections 112(r), 602(a) and 602(b) of the CAAA. Fugitive emissions shall be included in these limits for source categories listed in District Regulation 2.16.
- G11. Unless specified elsewhere in this permit, the owner or operator shall complete required monthly record keeping within 30 days following the end of each calendar month.
- G12. Unless specified elsewhere in this permit, the owner or operator shall submit annual reports demonstrating compliance with the emission limitations specified. The report shall contain monthly and consecutive 12-month totals for each pollutant that has a federally enforceable limitation on the potential to emit. All reports shall include the company name, plant ID number, and the beginning and ending date of the reporting period. The compliance reports shall clearly identify any deviation from a permit requirement or a declaration that there were no such deviations. All compliance reports shall include the following per Regulation 2.17, section 3.5.
- A certification statement: "Based on information and belief formed after reasonable inquiry, I certify that the statements and information in this document are true, accurate, and complete", and
 - The signature and title of a responsible official of the company.
 - The annual report must be postmarked no later than March 1 of the year following the calendar year covered in the annual report.
- G13. The owner or operator shall comply with all applicable requirements of the following federally enforceable District Regulations:

Regulation	Title
1.01	General Application of Regulations and Standards
1.02	Definitions
1.03	Abbreviations and Acronyms
1.04	Performance Tests
1.05	Compliance With Emissions Standards and Maintenance Requirements
1.06	Source Self-Monitoring, Emission Inventory Development and Reporting
1.07	Excess Emissions During Startups, Shutdowns, and Upset Conditions
1.08	Administrative Procedures
1.09	Prohibition of Air Pollution
1.10	Circumvention
1.11	Control of Open Burning
1.14	Control of Fugitive Particulate Emissions
1.18	Rule Effectiveness
1.19	Administrative Hearings
2.01	General Application (Permit Requirements)
2.02	Air Pollution Regulation Requirements and Exemptions
2.03	Authorization to Construct or Operate; Demolition/Renovation Notices and Permit Requirements
2.06	Permit Requirements – Other Sources
2.09	Causes for Permit Modification, Revocation, or Suspension
2.10	Stack Height Considerations
2.11	Air Quality Model Usage
3.01	Ambient Air Quality Standards
4.01	General Provisions for Emergency Episodes
4.02	Episode Criteria
4.03	General Abatement Requirements
4.04	Particulate and Sulfur Dioxide Reduction Requirements
4.05	Hydrocarbon and Nitrogen Oxides Reduction Requirements
4.06	Carbon Monoxide Reduction Requirements
4.07	Episode Reporting Requirements
6.01	General Provisions (Existing Affected Facilities)
6.02	Emission Monitoring for Existing Sources
7.01	General Provisions (New Affected Facilities)

- G14. The owner or operator shall comply with all applicable requirements of the following District-only enforceable regulations:

Regulation	Title
1.12	Control of Nuisances
1.13	Control of Objectionable Odors
2.08	Emission Fee, Permit Fees and Permit Renewal Procedures
2.17	Federally Enforceable District Origin Operating Permits
5.00	Definitions
5.01	General Provisions
5.02	Adoption and Incorporation by Reference of National Emission Standards for Hazardous Air Pollutants
5.14	Hazardous Air Pollutants and Source Categories
5.20	Methodology for Determining Benchmark Ambient Concentration of a Toxic Air Contaminant
5.21	Environmental Acceptability for Toxic Air Contaminants
5.22	Procedures for Determining the Maximum Ambient Concentration of a Toxic Air Contaminant
5.23	Categories of Toxic Air Contaminants
7.02	Adoption and Incorporation by Reference of Federal New Source Performance Standards

- G15. The owner or operator shall submit emission inventory reports, as required by Regulation 1.06, if so notified by the District.
- G16. The owner or operator shall submit timely reports of abnormal conditions or operational changes that may cause excess emissions, as required by Regulation 1.07.
- G17. Applications, reports, test data, monitoring data, compliance certifications, and any other document required by this permit shall be submitted to:

***Air Pollution Control District
701 W. Ormsby Avenue, Suite 303
Louisville, Kentucky 40203-3137***

Emission Unit U1: Rail Car to Truck Loading**Applicable Regulations**

FEDERALLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
5.15	Chemical Accident Prevention Provisions	1
7.22	Standard of Performance for New Volatile Organic Materials Loading Facilities	1, 2 and 3

Equipment

Emission Point	Description	Install Date	Applicable Regulations	Control ID	Release ID
EP 1	Rail car to truck bulk loading, 4500 gph ¹	NA	7.22	NA	NA

Control Devices

There are no control devices associated with Emission Unit U1.

¹ Process was permitted via attachment 23-97 in Permit 125-01-F(R1), bulk loading of solvents into tank trucks, trailers, or rail cars.

U1 Specific Conditions

S1. Standards

[Regulation 2.17, section 5.1]

a. HAP

- i. The owner or operator shall not allow *plantwide* single HAP emissions to equal or exceed 5 tons per consecutive 12-month period for each HAP.²
- ii. The owner or operator shall not allow *plantwide* total HAP emissions to equal or exceed 12.5 tons per consecutive 12-month period.²

b. VOC

- i. The owner or operator shall not allow *plantwide* VOC emissions to equal or exceed 25 tons per consecutive 12-month period.²
- ii. The owner or operator shall not load any volatile organic materials into any tank, truck, trailer, or railroad car from any loading facility unless such loading is accomplished by submerged fill, bottom loading, or equivalent methods approved by the District. Pneumatic, hydraulic, or other mechanical means shall be provided to prevent liquid organic compounds drainage from the loading device when it is removed from the hatch, or to accomplish complete drainage before such removal.
[Regulation 7.22, Section 3.1]
- iii. The owner or operator shall not load 20,000 gallons or more of volatile organic materials in any one day. [Regulation 7.22, Section 3.1]

c. District Regulation 5.15 Regulated Substance [40 CFR Part 68, Subpart G]

If any substances listed in Tables 1 through 4 are present at the stationary source in an amount greater than the threshold quantity specified in Regulation 5.15, the owner or operator shall comply with the requirements specified in Regulation 5.15, including the requirement to submit a Risk Management Plan in a method and format as specified by the District and EPA. (See Off-Permit Documents Section of this permit)

S2. Monitoring and Record Keeping

[Regulation 2.17, section 5.2]

The owner or operator shall maintain the following records for a minimum of five years and make the records readily available to the District upon request.

² On 03/10/14, the source requested to be exempt from the requirements of STAR by accepting the following limits: 25 tons per year of a regulated air pollutant, 5 tons per year of a single HAP, and 12.5 tons per year of combined HAPs.

a. HAP

- i. The owner or operator shall maintain a copy of the Material Safety Data Sheet (MSDS) or Safety Data Sheet (SDS) for each HAP-containing material.
- ii. The owner or operator shall monthly monitor and maintain records of the monthly throughput of each HAP-containing raw material, the HAP content, and the consecutive 12-month throughput of each HAP-containing raw material.
- iii. The owner or operator shall maintain records, including calculations, of the plantwide consecutive 12-month emissions of each single HAP and total HAP for each month in the reporting period.

b. VOC

- i. The owner or operator shall monthly monitor and maintain records of monthly throughput of each product processed through the loading rack and the consecutive 12-month throughput of each product stored.
- ii. The owner or operator shall maintain records, including calculations, of the plantwide consecutive 12-month VOC emissions, for each month in the reporting period.

c. 112(r) Regulated Substances (Regulation 5.15)

If any substances listed in Tables 1 through 4 are present at the stationary source in an amount greater than the threshold quantity specified in Regulation 5.15, the owner or operator shall monitor the processes and keep records required by Regulation 5.15.

S3. Reporting

[Regulation 2.17, section 5.2]

The owner or operator shall report the following information, as required by General Condition G12:

a. HAP

- i. The owner or operator shall report the plantwide consecutive 12-month emissions of each single HAP for each month in the reporting period.
- ii. The owner or operator shall report the plantwide consecutive 12-month emissions of total HAP for each month in the reporting period.

b. VOC

The owner or operator shall report the plantwide consecutive 12-month VOC emissions for each month in the reporting period.

c. 112(r) Regulated Substances [Regulation 5.15]

If any substances listed in Tables 1 through 4 are present at the stationary source in an amount greater than the threshold quantity specified in Regulation 5.15, the owner or operator shall comply with the reporting requirements specified in Regulation 5.15, including the requirement to submit a Risk Management Plan in a method and format as specified by the District and EPA.

Off-Permit Documents

Risk Management Plan, August 07, 2018